

Paul Alan Levy (pro hac vice sought)
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Attorneys for Defendant

UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF WASHINGTON

PREPARED FOOD PHOTOS, INC.,
f/k/a ADLIFE MARKETING &
COMMUNICATIONS CO., INC.,
a Florida for profit corporation,

Plaintiff,

v.

POOL WORLD, INC., a Washington for
profit corporation,

Defendant.

No. 2:23-cv-00160-TOR

**MOTION FOR ADMISSION OF
PAUL ALAN LEVY PRO
HAC VICE**

Defendant Pool World, Inc., through undersigned counsel, moves the Complaint Court to admit its lead counsel, pro hac vice, for the following reasons:

1. Paul Alan Levy is an attorney at Public Citizen Litigation Group and maintains his practice at 1600 20th Street NW. Washington, D.C. 20009, where his phone number is (202) 588-7725 and his email address is plevy@citizen.org.

2. Mr. Levy has been admitted to practice in the District of Columbia since 1978, in New York since 1984, and in many federal courts. A complete list of his bar admissions is attached as Exhibit A.

3. Mr. Levy's local co-counsel will be Stephen Kirby, WSBA #43228, whose firm is Kirby Law Office, PLLC, at 1312 North Monroe Street, Spokane, Washington 99201, where his phone numbers are (509) 795-4863 | (510) 588-4732 and his email address is

1 kirby@kirbylawoffice.com.

2 4. Pool World has retained Mr. Levy to provide pro bono representation in this case,
3 because he has specialized in online speech and intellectual property litigation since the turn
4 of the century. See [https://www.citizen.org/about/person/paul alan levy/](https://www.citizen.org/about/person/paul%20alan%20levy/); Eugene Volokh,
5 “May Be The Most Helpful Brief I’ve Ever Read,” Volokh Conspiracy (May 19, 2022),
6 <https://reason.com/volokh/2022/05/9/may-be-the-most-helpful-brief-ive-ever-read/>.

7 5. There are no pending disciplinary proceedings regarding Mr. Levy. He has never
8 been the subject of disciplinary sanctions from a bar or bar association, except that, on two
9 occasions, when bars in two jurisdictions in which he no longer practiced started charging
10 renewal fees, without Mr. Levy having learned of the changes, his membership was
11 suspended. When Mr. Levy learned of the fees, he resigned from each of the bars.

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13
14 Respectfully submitted,

15 /s/ Stephen Kirby
16 Stephen Kirby, WSBA #43228
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28 Attorneys for Defendant

June 26, 2023

EXHIBIT A

Michigan Bar	May 20, 1977 (resigned)	
D.C. Bar	March 14, 1978	Bar No. 946400
New York Bar	January 16, 1984	Bar No. 1894005

United States District Courts:

E.D. Mich	1977	
D. Md.:	1978 (since resigned)	
D.D.C.:	May 1, 1978	
S.D. Ill.	2000 (since resigned)	
D. Colo.	2009 (since resigned)	
S.D.N.Y.	2011	

United States Courts of Appeals: (all court of appeal dates are approximate)

D.C. Circuit	1980	
1st Circuit	1991	
2d Circuit	1983	
3d Circuit	1980	
4th Circuit	1981	
5th Circuit	1990	
6th Circuit	1986	
7th Circuit	1985	
8th Circuit	1985	
9th Circuit	1984	
10th Circuit	1985	
11th Circuit	1986	

Supreme Court of the United States 1980

Pro hac admissions in a variety of states and US District Courts

I maintained my Michigan Bar membership for many years after moving to D.C. following a judicial clerkship in Michigan, but took inactive status, which at the time meant there was no dues requirement. Unbeknownst to me, the Michigan Supreme Court ruled that inactive members would have to pay dues; my Michigan license was eventually suspended for non-payment of those dues. When I learned of this change, I resigned from the Michigan Bar.

Similarly, many years after I was admitted to the United States District Court for the District of Maryland, that court imposed a requirement of periodic fees. I received no notice of that rule and was suspended for nonpayment. When I learned of the new rule, I resigned from that Bar.

I resigned from the Bars of the Southern District of Illinois and the District of Colorado after those courts decided to start charging periodic fees.

/s/ Paul Alan Levy

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of June, 2023, I am electronically filing the foregoing with the Clerk of the Court using the CM/ECF System, which in turn will automatically generate a Notice of Electronic Filing (NEF) to all parties in the case who are registered users of the CM/ECF system. The NEF for the foregoing will specifically identify the recipients of electronic notice. I hereby certify that I have mailed the document by United States Postal Service to the following non-CM/ECF participants: none.

/s/ Stephen Kirby

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